

15TH EITI BOARD MEETING, PARIS, 1 MARCH 2011

Board Paper 15-3-C

Secretariat Review: Nigeria

For decision

EITI Validation Committee

14 February 2011

SECRETARIAT REVIEW: NIGERIA

1 Recommendation

The Validation Committee recommends that the Board agrees the following:

The EITI Board designates Nigeria as EITI Compliant as of 1 March 2011. In accordance with the EITI Rules:

- *Nigeria must be revalidated within 5 years (i.e., by 29 February 2016);*
- *Stakeholders in the process may call for a new validation at any time within that period if they think the process needs reviewing; and*
- *Where valid concerns exist that a country has become EITI Compliant, but its implementation of the EITI has subsequently fallen below the standard required for Compliance, then the Board reserves the right to require the country to undergo a new validation or face delisting from the EITI.*

The Board congratulates the government of Nigeria for its commitment to the EITI process. The Board also congratulates the Nigerian multi-stakeholder working group (NSWG) and the Secretariat NEITI for its strong collaboration and effective oversight of EITI implementation, especially in the past few months to respond to the concerns of the Board.

The Board also welcomed the Government of Nigeria's commitment to further strengthen implementation by incorporating the revenues from the Joint Development Zone with Sao Tome and Principe and the solid mineral sector to the EITI reporting, and to revitalise the Inter-Ministerial Task Team. The Board calls on the government and multi-stakeholder working group to ensure that these actions are implemented in full and these important reports are completed in the next year. The Board noted the richness of the observations and recommendations for further improvement of the management of extractive revenues both in the Validation Report, and in the 2006-2008 EITI reconciliation report. The Board urges the government and multi-stakeholder group to act upon those findings. The Board tasks the EITI International Secretariat with providing regular progress reports to the EITI Board.

2 Background

Nigeria committed to implement the EITI in November 2003 and launched Nigeria EITI (NEITI) in February 2004. The NEITI bill was introduced to the National Assembly in December 2004 and the NEITI Act was passed into law on May 28, 2007. Nigeria's first report, covering calendar years 1999-2004, was published in 2006 and helped shape the EITI standard. Nigeria was accepted as an EITI Candidate country on 27 September 2007.

Nigeria submitted its final Validation report to the EITI Board on 29 June 2010. The final validation report was endorsed by the Nigeria EITI NSWG on 13 May 2010. The Validator concluded that Nigeria has met all of the indicators set out in the EITI Validation Guide. However, the Board noted the Validator's concerns regarding the timeliness of EITI reporting and governance processes. The EITI Criteria require regular reporting. At that time, Nigeria's last report was published in 2009 covering financial data from 2005. The Board also sought steps to strengthen the functioning of the NSWG.

Furthermore, the Board was not satisfied that the validation report conclusively demonstrated that EITI implementation in Nigeria had met all of the validation requirements. The Board considered that a number of

remedial actions were required before Nigeria could be considered to be Compliant. The Board agreed that a review would be undertaken by the EITI International Secretariat following the publication and dissemination of the 2006-2008 report. Indicators 5, 8, 9, 13, 14, 15 and 18 would then be reassessed.

Based on the validator's findings, the Board recommended six remedial actions, necessary for achieving compliance¹:

1. Publication and dissemination of the EITI report covering 2006-2008, to include a clearer definition of materiality for coverage in the report agreed by the NSWG. The NSWG is encouraged to consider a specific figure that defines material payments and revenues, rather than a percentage. This new definition should then be incorporated into the reporting templates for the 2006-08 report;
2. Development and agreement of an NSWG Charter to strengthen oversight of the EITI process;
3. As per the Indicator Assessment Tool for Indicator 13, the government and NSWG should take steps to ensure that all government disclosures to the reconciler are based on audited accounts to international standards and agree a strategy for addressing these issues in accordance with the requirements as specified in Validation IAT 13.
4. Development, agreement and implementation of an action plan to ensure the comprehensive disclosure of signatory bonuses, and to improve the application of international auditing standards to cover these signature bonuses;
5. Production of a 2005 popular NEITI audit report for a more effective dissemination; and
6. The NSWG develops and agrees a workplan that sets out how the above actions can be accomplished by 19 April 2011. The workplan should also address the steps required by the NSWG to ensure that figures from the Joint Development Zone with Sao Tome e Principe are included in the report as soon as possible.

In addition, the Board strongly urges the Government to:

1. reinvigorate the Inter-Ministerial Task team (ITT) to coordinate implementation of the remediation plan of the 2005 audit report and consider the findings from the 2006-08 report; and
2. Move ahead with a report of the solid minerals sector by end of June 2012, whether as a separate report or as part of the overall report.

The board agreed that when the NEITI assessed that the remedial actions had been addressed, they should invite the EITI International Secretariat to reassess Nigeria's compliance. The Secretariat Review is attached below. The Secretariat consulted widely with stakeholders during the review. Following the Board decision on Nigeria's compliance, the Secretariat Review will be published along with the Validation Report. This will ensure that the basis for the Board's decision regarding compliance is clear to all stakeholders.

¹ From the EITI Board minutes of the meeting in Dar es Salaam.

EITI INTERNATIONAL SECRETARIAT REVIEW OF NIGERIA, 5 FEBRUARY 2011

In accordance with the Board decision in October 2010 in its meeting in Dar es Salaam (see Board Paper 13-3-D Validation Nigeria), this review was prepared by the EITI International Secretariat to supplement the Nigeria Validation Report (February 2010)².

3 Introduction

Nigeria issued its first (disaggregated) EITI Report in December 2006, covering company payments and government receipts from 1999-2004. The second report was completed in August 2009 (data from 2005). A third EITI report was published in February 2011 (data from 2006 to 2008). Preparations for a separate report on revenues and payments from the solid minerals sectors have commenced and a consultant has been selected to produce the report for publication in the first quarter of 2012.

Nigeria's validation commenced in December 2009. A final report (endorsed by stakeholders) was submitted to the EITI Board on 29 June 2010. Having reviewed the validator's findings, the EITI Board designated Nigeria as Candidate country as of 19 October 2010. Based on a thorough assessment of the specific circumstances, Nigeria was designated 'close to compliant'.

As set out in EITI Policy Note #3, the designation of "close to compliant" applies in cases where the EITI Board considers that "a Candidate country has not only made meaningful process, but can reasonably be expected to achieve Compliance within a very short time". It provides a mechanism whereby the Board can designate a country as Compliant based on a review undertaken by the EITI International Secretariat. The EITI Board decision set out a series of remedial actions needed in order to attain compliance. The Secretariat's assessment of progress is presented in section 3 below.

The EITI International Secretariat conducted its review in January and February 2011, including consultations with key stakeholders and a presentation of findings by the multi-stakeholder working group on 14 January 2011 via a video conference attended by the Secretariat in Oslo and with the reconciler Hart Group/S.S Afemikhe.

4 Nigeria response to the Validator's findings

Following validation and the EITI Board decision in October 2010, the Nigerian government and the EITI multi-stakeholder working group (NSWG) undertook a number of actions aimed at addressing the recommendations set out by the Board in its meeting in Dar es Salaam.

On 11 November 2010, the Federal Government of Nigeria (FGN) approved the NSWG recommendation to appoint Mrs Zainab Shamsuna Ahmed as Executive Secretary of NEITI for tenure of 5 years.

On 4 November 2010, the (NSWG) established a **taskforce** and agreed a work plan to accomplish the Board recommendations in order to achieve compliance. This task force was made up of representatives of the NSWG, the Secretariat (NEITI), the World Bank and civil society. The taskforce was formed by:

1.	Lekke Alder	(NSWG)	Chairman
2.	Mazi Sam Oluabunwa	(NSWG)	Member
3.	Jafaru Paki	(NSWG)	Member
4.	Mrs Zainab Ahmed	(Executive Secretary)	Member

²The Nigeria validation report is available in the internal area of the EITI website.

5.	Faith Nwadishi	(Publish What You Pay)	Member
6.	Amanda Lumun' Feese	(World Bank)	Member
7.	Tariye George	Team Leader Oil & Gas (NEITI)	Member
8.	Garba Yakawada	Audit Team Leader (NEITI)	Member
9.	Peter Ogbobinne	General Counsel (NEITI)	Member
10.	Orji Ogonnaya Orji	Director Communication (NEITI)	Secretary

The terms of reference set out for the task force include:

- Completion of 2006-2008 NEITI Audit report.
- Development of a Board Charter.
- Production of a popular version of the 2005 Audit Report.
- Addressing issues of disclosure in the Oil, Gas and Mining sector based on audited accounts.
- Steps to ensure inclusion of figures from the Joint-Development Zone (JDZ) with Sao Tome and Principe (STP).
- Re-invigoration of the Inter Ministerial Task Team on remediation issues.

The NSWG approved the **work plan** prepared by the taskforce for fulfilling the remedial actions set out by the International Board in October 2010. Actions taken or facilitated by the taskforce in preparation for the remedial actions to be completed included:

- Deployment of NEITI technical staff to work with the auditors.
- Audit template workshop held for covered entities.
- Awareness-raising among stakeholders.
- Engagement of a consultant to develop the Board Charter.

The NSWG and NEITI Secretariat have completed the following actions:

- 1) 2006-2008 Report published on 1 February 2011 (by Hart Nurse Ltd in association with S.S.Afemikhe & Co).
- 2) The Board charter was approved by the NSWG on 13 January 2011 and was subsequently published on the NEITI website (<http://www.neiti.org.ng/files-pdf/NEITIBoardCharter-010211.pdf>).
- 3) A simplified version of the 2005 Audit report was posted in the NEITI's website³ in January 2011.
- 4) NEITI worked with the Office of the Auditor-General and Accountant-General to ensure that the Government disclosures are based on audited accounts to international standards.
- 5) NEITI worked with the Federal Inland Revenues Services (FIRS) and the Office of the Auditor-General of the Federation to include signature bonuses on the reconciliation reports.
- 6) Inter-Ministerial task (IMTT) has been reconvened.
- 7) Auditing of the Solid Minerals will be prepared separately and is due to be published in the 1st quarter of 2012.
- 8) Terms of reference for the reconciler to include the revenue from the JDZ have been developed.

On 20 January 2011, NEITI 's Executive Secretariat sent a letter to the International Secretariat setting out how NEITI had sought to address all the remedial issues and invited the International Secretariat to conduct a review. Some additional clarifications were sought.

³ See <http://www.neiti.org.ng/files-pdf/News-2005NEITIAuditSimplified-221210.pdf>

5 Secretariat Review of Remedial Actions

As set out in Board Paper 13-3-D Validation Nigeria, the EITI Board agreed in Dar es Salaam on the 19 October 2010 six remedial actions and tasked the Secretariat with reassessing validation indicators 5, 8, 9, 13, 14, 15 and 18.

5.1 Remedial Action 1

1. *Publication and dissemination of the EITI report covering 2006-2008, to include a clearer definition of materiality for coverage in the report agreed by the NSWG. The NSWG is encouraged to consider a specific figure that defines material payments and revenues, rather than a percentage. This new definition should then be incorporated into the reporting templates for the 2006-08 report;*

5.1.1 Validator's findings

The validator reported the NSWG's agreed definition of materiality:

'Materially' means that aggregated financial flows for the period are not misstated by more than five percent. Consultant shall strive to report its findings with at least a 90 percent confidence level, a level which is consistent with international audit standards on the date of this Contract.

Citing stakeholder agreement on the reporting templates, the validator concluded that the indicator was met.

5.1.2 Progress since validation

The 2006-2008 Report has been published (see <http://www.neiti.org.ng/2006-2008ReconciliationReport.html>). A definition of materiality has been adopted and agreed by the NSWG as set out in the terms of reference for the reconciler and in the reporting templates approved on 19 August 2010. The final report was endorsed by the NSWG on 13 January 2011. The definition of materiality includes two tier materiality thresholds:

- 1) Revenue streams to be included: receipt/payment streams in excess of US\$ 100 million are to be considered material. In accordance with this definition, the payment streams that were considered material for the purpose of the report are as follows:
 - Realization of oil and gas accrued to the Federation and sold by the Nigerian National Petroleum Corporation (NNPC)
 - Petroleum profits tax (PPT)
 - Royalty
 - Signature bonuses
 - Withholding taxes
 - PAYE
 - Contributions to Niger Delta Development Corporation
 - Education tax
 - Value Added tax
 - Company income tax
- 2) Companies: In accordance with the NEITI act, all payments and receipts of each of the above revenue streams were included. The official register of companies involved in the oil and gas sector in Nigeria is maintained by the Department of Petroleum Resources (DPR).

5.1.3 Secretariat's Assessment

The 2006-2008 Report has been published. The Secretariat consulted the reconciler to seek further clarification about this definition of materiality. The reconciler confirmed that the adopted definition of materiality was followed in the completion of this reconciliation. They explained that the DPR was late in providing an update to the previous compiled list of companies (up to 2005) and this meant that some companies could not be contacted to provide information but "with the possible exception of signature bonuses, there is a high probability that none of the omitted companies made any material payments" (Signature bonuses are discussed under remedial action 4). The material differences found are explained in Section 2.7 of the 2006-2008 EITI reconciliation report.

The EITI International Secretariat's assessment is that the remedial action has been addressed and the indicator 9 has been met.

5.2 Remedial Action 2

Development and agreement of an NSWG Charter to strengthen oversight of the EITI process

5.2.1 Validator's findings

In its evaluation of Indicator 5, the validator concluded that:

Both to encourage slightly greater expediency and attendance and, more importantly, address shortfalls over NSWG roles, responsibilities, representativeness, and duties, the validators regard the development of an NSWG Board Charter as essential in order to ensure ongoing effective implementation of EITI in line with letter and spirit of both the NEITI Act and EITI Rules.

5.2.2 Progress since validation

NEITI engaged external consultant Tagbo Agbazue from South Africa to assist them with the production of the Board Charter. A workshop with key NEITI staff and members of the NSWG was held in Accra to discuss the Draft Charter. The International Secretariat participated in the workshop. Finally, the Board Charter was developed and circulated for wider inputs from stakeholders, including civil society. The final draft was approved by the NSWG at its meeting on 13 January 2011. The Board Charter was published on the NEITI website on January 2011 (see <http://www.neiti.org.ng/files-pdf/NEITIBoardCharter-010211.pdf>).

5.2.3 Secretariat's Assessment

The Board Charter is comprehensive and more clearly sets out the roles of the NSWG and the Secretariat NEITI. The Charter also establishes the composition of the NSWG, the duties and roles of the Chairperson and the Executive Secretary and the duties of members of the NSWG. Similarly, it provides clear rules for the NSWG meetings and Committees and guidelines for servicing the NSWG. The adopted charter clearly addresses the concerns raised in the validation report regarding governance of the NSWG and NEITI.

The EITI International Secretariat's assessment is that the remedial action has been addressed and the indicator 5 has been met.

5.3 Remedial Action 3

As per the Indicator Assessment Tool for Indicator 13, the government and NSWG should take steps to ensure that all government disclosures to the reconciler are based on audited accounts to international standards and agree a strategy for addressing these issues in accordance with the requirements as specified in Validation IAT 13

5.3.1 Validator's findings

The validator's judgement was that the requirements of this indicator were met. They also noted that "the Signature bonus issue is peculiar as the processes of payment and receipt were cumbersome and not streamlined to be easily auditable. The weaknesses in this one single revenue flow are being addressed in cooperation with the Office of the Accountant-General for the Federation". The EITI Board noted that it was clear from the validator's report that the reporting and auditing of signature bonuses is unclear, and accordingly agreed that indicator 13 should be reassessed..

5.3.2 Progress since validation

The Office of the Accountant-General of the Federation has attested that amounts disclosed are consistent with the audited financial statement of the Government in the respective reporting period (see Appendix P of the 2006-2008 Reconciliation report). The NSWG understands that the audit standards applied in government audit are consistent to International Auditing Standards.

NEITI has worked in collaboration with the Office of the Auditor General of the Federation to ensure that government disclosures are based on audited accounts to international standards. The Auditor-General has certified that government accounts are prepared to generally accepted Accounting Practice and accounts including the federation accounts are audited annually to Nigerian auditing standards. The NEITI auditors/reconcilers regard Nigerian accounting/auditing standards as very high. The NSWG is satisfied with the level of the reliability of the data disclosed by the government agencies as they are based on accounts audited to national standards. The Institute of Chartered Accountants of Nigeria (ICAN) is working with the Nigerian government to ensure that Nigerian accounting/auditing standards are fully on a par with international standards.

The reconcilers, Hart Nurse Ltd and S.S. Afemikhe & Co have assessed the reliability of government audits and considered them to be in line with international standards. They wrote:

“Following consultations between the NEITI secretariat, Hart Group and the Auditor General, it has been established that government accounts and the financial statements of state agencies and state-owned companies are prepared and are subject to various forms of audit in accordance with Nigerian law. The Auditor General informed us that government, state agencies and state-owned companies’ accounts are prepared in accordance with generally accepted accounting standards.

The template data provided by government reporting entities has been attested by the Auditor General as being consistent with the government accounts that have been audited”.

NSWG is equally satisfied with the assessment by the reconcilers. NSWG approved the 2006-2008 Report on 31 January 2011.

5.3.3 Secretariat’s Assessment

The Secretariat is satisfied that the NSWG is content with the approach to address this issue.

The EITI International Secretariat’s assessment is that the remedial action has been addressed.

5.4 Remedial Action 4

Development, agreement and implementation of an action plan to ensure the comprehensive disclosure of signatory bonuses, and to improve the application of international auditing standards to cover these signature bonuses.

5.4.1 Validator’s findings

See above.

5.4.2 Progress since validation

Signature bonuses have been included in the 2006-2008 reconciliation report. These are reported in Section 6.3 of the report. The information provided include: Central Bank of Nigeria’s records on signature bonuses, bonuses listed company by company received by the Department of Petroleum Resources (DPR) and the Office of the Accountant General of the Federation (OAGF). Information on signature bonuses was reported by the companies in their templates submitted to the reconciler in accordance to an initial list of liable companies submitted by the DPR. However, the list provided by the DPR missed a number of companies that were liable but were not contacted. The missing information from these companies caused the discrepancies observed in the report.

The Office of the Accountant-General certified that the information about signature bonuses were consistent with audited financial stamen of the Government. Both the letters of representation from the Office of the Accountant-General of the Federation and from the reporting companies can be found in Appendix “P” of the report.

5.4.3 Secretariat’s Assessment

Signature bonuses were disclosed in the 2006-2008 reconciliation report. This revenue stream was disclosed comprehensively from the government side although the reconciler was not able to fully reconcile these revenues with the company side.

The following table explains this situation:

Year	Government (USD'000)	% of total revenues	Company (USD'000)	Difference (USD'000)	% of the total revenues represented by this difference
2006	985,100	2,18 %	720,741	264,359	0,59 %
2007	509,849	1,18 %	383,396	126,453	0,29 %
2008	180,051	0,30 %	30,051	150,000	0,25%

The Government has unilaterally disclosed all signature bonuses and has provided the detailed information of the missing companies that have not reported. This disclosure of the companies that failed to provide information to complete the reconciliation allows for further follow up by NSGW/NEITI and other official agencies.

In its decision in Dar es Salaam the Board raised concerns that "the reporting and auditing of signature bonuses is unclear". The 2006-2008 EITI Reconciliation addressed the reporting of signature bonuses in a satisfactory manner. While encountering discrepancies due to the difficulties in obtaining data both from official entities and companies, the report contains useful information to allow further investigations of causes for those discrepancies. The issue of auditing government data (including signature bonuses) is addressed remedial action 3, above.

The Secretariat's view that the intended remedial action has been completed but recommends that in communicating its decision the Board clearly recommends the NSWG/NEITI to improve this deficiency in subsequent reports.

The EITI International Secretariat's assessment is that the remedial action has been addressed and the indicators 13, 14 and 15 have been met.

5.5 Remedial Action 5

Production of a 2005 popular NEITI audit report for a more effective dissemination

5.5.1 Validator's findings

The validators noted that the data published in NEITI audit reports are technical in nature and are not easily discernable to the lay person. The simplified version of the NEITI report are easier to understand, but this report was not available at the time the road shows regarding the 2005 audit report were held. The Board agreed that the 2005 report is complex and effective dissemination requires a timely popular version.

5.5.2 Progress since validation

The simplified version of the 2005 NEITI audit report was published on the NEITI website in January 2011 (see <http://www.neiti.org.ng/files-pdf/News-2005NEITIAuditSimplified-221210.pdf>)

5.5.3 Secretariat's Assessment

The EITI International Secretariat's assessment is that the remedial action has been addressed and the indicator 18 has been met.

5.6 Remedial Action 6

The NSWG develops and agrees a workplan that sets out how the above actions can be accomplished by 19 April 2011. The workplan should also address the steps required by the NSWG to ensure that figures from the Joint Development Zone with Sao Tome e Principe are included in the report as soon as possible.

5.6.1 Validator's findings

The validator concluded that indicator 8 was met. However, the Board noted that:

With the absence of reporting from the JDZ, the government has not comprehensively removed all obstacles to comprehensive EITI implementation. The secretariat recommends that the Board establishes this as a remedial action necessary to achieve compliance, and that compliance with this indicator is reassessed following the publication of the 2006-2008 Report.

5.6.2 Progress since validation

Following the EITI Board's decision, the NSWG met on 4 November 2010 to receive a report and agree on a plan of action. A taskforce, as discussed in section 2 "Nigeria response to the Validator's findings" of this review, has been responsible for ensuring that all remedial actions are implemented.

On ensuring that that figures from the Joint Development Zone with Sao Tome e Principe are included in EITI reporting as soon as possible, a joint meeting between NEITI and the Joint Development Authority was held on 6 December 2010. The meeting was also attended by a visiting mission of the World Bank. A Tri-partite subcommittee on the JDZ was reconstituted and Terms of Reference for the implementation of the EITI in the zone were drafted including an agreement on producing a reconciliation report to cover revenues from the JDZ from 2005 to 2010. The subcommittee includes representatives from NEITI, the WB, PWYP and the Director and Head Legal of the Joint Development Authority (JDA), Sam Dimka and Ahmed Yabo, respectively. The subcommittee met on 7 January 2011 to adopt the ToR for the EITI reconciliation. These ToRs await approval by the JDA. The meeting also discussed possible sources of funding for the production of EITI reconciliation reports into the future. The World Bank has provided support and is expected to continue supporting this work.

5.6.3 Secretariat's Assessment

The NSWG and NEITI Secretariat responded swiftly to the decision of the Board in October 2010 to give Nigeria six months to complete remedial actions. They agreed a workplan in early November 2010 which has subsequently been implemented. The workplan included starting preparations for the inclusion of the JDZ which have been completed, notably by establishing a tri-partite subcommittee to implement the 2005-2010 JDZ EITI reconciliation report. It is the Secretariat's view that these actions satisfied the remedial action and also recommends that in communicating the decision of the Board it is mentioned that the JDZ EITI report is completed promptly.

The EITI International Secretariat's assessment is that the remedial action has been addressed and the indicator 8 has been met.

5.7 Progress on suggested actions

In addition, the Board strongly urges the Government to:

- 1. reinvigorate the Inter-Ministerial Task team (ITT) to coordinate implementation of the remediation plan of the 2005 audit report and consider the findings from the 2006-08 report; and*
- 2. Move ahead with a report of the solid minerals sector by end of June 2012, whether as a separate report or as part of the overall report.*

These issues will be considered by subsequent validations.

5.7.1 Secretariat's Assessment

The Inter-Ministerial Task team (ITT) has been reconvened. As reported by the NEITI Secretariat: "NEITI has requested the inter-ministerial task team (IMTT) set up by the Federal Government of Nigeria on the findings of its

2005 Audit report to recommend steps to implement the remediation issues including sanctions for erring covered entities. The Chairman of NEITI, Professor Assisi Asobie made the request at the first meeting of the reconstituted Task Team held in Abuja. He explained that the IMTT is to advise NEITI on all remediation issues arising from the Audit report. The remediation issues identified by the report were: revenue flows interface; improving Nigeria's oil and gas metering infrastructure; cost determination; human capacity development; and general improvement of extractive sector governance.

Regarding the inclusion of the Solid Minerals sector , NEITI has reported: "The Ministry of Mines and Steel Development has pledged to work closely with NEITI in the proposed Solid Minerals Audit expected to commence this year. The Minister of Mines and Steel Development, Mohammed Musa Sada made the pledge in Abuja while receiving the Executive Secretary of the Nigeria Extractive Industries Transparency Initiative (NEITI), Mrs Zainab Ahmed. The Minister explained that a closer partnership between the Ministry and NEITI will accelerate development of the mining and solid mineral sector. This will equally promote prudent management of revenue flows and attract Foreign Direct Investment to the sector. The Minister welcomed the renewed move by NEITI to build partnership and cooperation among companies, government agencies, the Civil Society and other investors in the extractive sector. He advised NEITI to work towards the take-off of the proposed Scoping Study of the solid minerals sector, create awareness, and engage all categories of mining companies. The Executive Secretary of NEITI, Mrs Zainab Ahmed, explained that the NEITI was ready to commence the study and the Audit this year with a view to be published in the first quarter of 2012. This follows a procurement process for a consultant which is already well advanced. Mrs Ahmed appealed to the Minister to extend to NEITI all necessary assistance, particularly the data required for the implementation of EITI principles in Nigeria's Solid Minerals Sector".

Initial actions regarding the reinvigoration of the Inter-Ministerial Task team (ITT) and the inclusion of Solid Minerals sector in the EITI suggest that NSWG/NEITI is on track to address the recommended actions by the Board.

6 Conclusion

The EITI International Secretariat is satisfied that Nigeria has undertaken all the remedial actions requested by the Board and met indicators 5, 8, 9, 13, 14, 15 and 18.